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Attorneys for Defendants STRUCTURE TONE, INC. s/h/a STRUCTURE TONE
(UK), INC. and STRUCTURE TONE GLOBAL SERVICES, INC.

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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IN RE LOWER MANHATTAN DISASTER SITE
LITIGATION

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SEGUNDO VILLARROEL AND MARTHA L.
VILLARROEL,

Plaintiffs,

-against-

120 LIBERTY STREET LLC, 233 BROADWAY
OWNERS, LLC, 59 MAIDEN LANE ASSOCIATES,
LLC, 75 BROAD LLC, AJ GOLDSTEIN & CO., ALAN
KASMAN DBA KASCO, ALAN L. MERRIL, ANN
TAYLOR STORES CORPORATION, BANKERS
TRUST COMPANY, BATTERY PARK CITY
AUTHORITY, BETTY JEAN GRANQUIST, BFP ONE
LIBERTY PLAZA CO., LLC, BLACKMON-
MOORING-STEAMATIC CATASTROPHE, INC.
D/B/A BMS CAT, BOARD OF EDUCATION FO THE
CITY OF NEW YORK, BROOKFIELD FINANCIAL
PROPERTIES, INC., BROOKFIELD FINANCIAL
PROPERTIES, LP, BROOKFIELD PARTNERS, LP,
BROOKFIELD PROPERTIES CORPORATION,
BROOKFIELD PROPERTIES HOLDINGS INC., BT
PRIVATE CLIENTS CORP., CAROL GAYNOR
TRUST, CAROL GAYNOR, AS TRUSTEE OF THE
CAROL GAYNOR TRUST, CAROL MERRIL
GAYNOR, DEPARTMENT OF BUSINESS SERVICES,
DEUTSCHE BANK TRUST COMPANY, DEUTSCHE
BANK TRUST COMPANY AMERICAS, DEUTSCHE
BANK TRUST CORPORATION, ENVIROTECH
CLEAN AIR, INC., FRED GOLDSTEIN, GENERAL RE

**NOTICE OF
ADOPTION**

07 CV 01546

SERVICES CORP., GPS ENVIRONMENTAL CONSULTANTS, INC., HARLAND GAYNOR, AS TRUSTEE UNDER A DECLARATION OF TRUST, HAROLD G. GOLDSTEIN, AS TRUSTEE UNDER A DECLARATION OF TRUST, HERMAN L. BLUM, AS TRUSTEE UNDER THE LAST WILL AND TESTAMENT OF LOUIS W. GOLDSTEIN, HILLMAN ENVIRONMENTAL GROUP, LLC, IDELL GOLDSTEIN, AS TRUSTEE UNDER DECLARATION OF TRUST, INDOOR ENVIRONMENTAL TECHNOLOGY, INC., JEMB REALTY CORP., KASCO RESTORATION SERVICES CO., MARGARET G. WATERS, MARGUERITE K. LEWIS, AS TRUSTEE UNDER THE LAST WILL AND TESTAMENT OF LOUIS W. GOLDSTEIN, MATTHEW A. GELBIN, AS TRUSTEE OF THE GELBIN FAMILY, MERRILL LYNCH & CO, INC., NATALIE S. LEBOW, AS TRUSTEE OF THE JEREMIAH PHILIP LEBOW REVOCABLE TRUST, NATALIE S. LEBOW, AS TRUSTEE OF THE JERRY P. LEBOW FAMILY TRUST, NATIONAL ASSOCIATION OF SECURITIES DEALERS, INC., NEW LIBERTY PLAZA LP, NEW YORK CITY INDUSTRIAL DEVELOPMENT AGENCY, NEW YORK CITY INDUSTRIAL DEVELOPMENT CORPORATION, NOMURA HOLDING AMERICA, INC., NOMURA SECURITIES INTERNATIONAL, INC., ONE LIBERTY PLAZA, PAMELA BETH KLEIN, AS TRUSTEE OF THE PAMELA AND ROWAN KLEIN TRUST, ROWAN K. KLEIN, AS TRUSTEE OF THE PAMELA AND ROWAN KLEIN TRUST, RUTH G. LEBOW, SHIRLEY G. SHOCKLEY, AS TRUSTEE UNDER DECLARATION OF TRUST, STRUCTURE TONE (UK), INC., STRUCTURE TONE GLOBAL SERVICES, INC., SYLVIA R. GOLDSTEIN, THE BOARD OF MANAGERS OF THE ONE LIBERTY PLAZA CONDOMINIUM (CONDO #1178), THE CITY UNIVERSITY OF NEW YORK, THE NEW YORK CITY SCHOOL CONSTRUCTION AUTHORITY, THE ONE LIBERTY PLAZA CONDOMINIUM (CONDO #1178), TISHMAN INTERIORS CORPORATION, TOSCORP INC., TRIBECA LANDING L.L.C., TUCKER ANTHONY, INC., TULLY CONSTRUCTION CO., INC., TULLY INDUSTRIES, INC., WESTON SOLUTIONS, INC., WFP ONE LIBERTY PLAZA CO., L.P., WFP ONE LIBERTY PLAZA, CO. GP, CORP.,

WFP TOWER A CO., WFP TOWER A CO. G.P. CORP.,
WFP TOWER A. CO., L.P., WFP TOWER B CO. G.P.
CORP., WFP TOWER B HOLDING CO., LP, WFP
TOWER B. CO., L.P., AND WORLD FINANCIAL
PROPERTIES, L.P., ET AL.,

Defendants.

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PLEASE TAKE NOTICE that defendants, STRUCTURE TONE, INC. s/h/a STRUCTURE TONE (UK), INC. and STRUCTURE TONE GLOBAL SERVICES, INC. (hereinafter "STRUCTURE TONE"), as and for their responses to the allegations set forth in the Complaint by Adoption (Check-Off Complaint) related to the Master Complaint filed in the above-referenced action, hereby adopts STRUCTURE TONE's Answer to the Master Complaint dated July 30, 2007, which was filed in the matter of *In Re World Trade Center Lower Manhattan Disaster Site Litigation*, 21 MC 102 (AKH).

To the extent that STRUCTURE TONE's Answer to the Master Complaint does not comprehensively address any of the specific allegations within the Check-Off Complaint in the above-captioned matter, STRUCTURE TONE denies knowledge or information sufficient to form a belief as to the truth of such specific allegations.

WHEREFORE, STRUCTURE TONE, INC. s/h/a STRUCTURE TONE (UK), INC. and STRUCTURE TONE GLOBAL SERVICES, INC., demands judgment dismissing the above-captioned action as against it, together with its costs and disbursements.

Dated: New York, New York
August 18, 2008

A handwritten signature in blue ink, appearing to read 'R. McTiernan, Jr.', is written over a horizontal line.

ROGER P. McTIERNAN, JR. (RPM 1680)
BARRY, McTIERNAN & MOORE
Attorneys for Defendants
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